

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RELEVENT SPORTS, LLC,

Plaintiff,

v.

FÉDÉRATION INTERNATIONALE DE  
FOOTBALL ASSOCIATION and UNITED  
STATES SOCCER FEDERATION, INC.,

Defendants.

No. 1:19-cv-8359 (VEC)

**DECLARATION OF H. CHRISTOPHER BOEHNING IN SUPPORT OF  
FIFA’S MOTION TO DISMISS COUNT I OF THE AMENDED COMPLAINT**

I, H. Christopher Boehning, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am a member of Paul, Weiss, Rifkind, Wharton & Garrison LLP. I represent defendant Fédération Internationale de Football Association (“FIFA”) in the above-captioned case.

2. I submit this declaration in support of FIFA’s motion to dismiss Count I of Plaintiff’s Amended Complaint. The statements in this declaration are based on my personal knowledge.

3. Attached as Exhibit A is a true and correct copy of excerpts of the FIFA Statutes, which are cited throughout the Amended Complaint.

4. Attached as Exhibit B is a true and correct copy of excerpts of FIFA’s Regulations Governing International Matches, which are among the “rules and policies” referenced throughout the Amended Complaint.

5. Attached as Exhibit C is a true and correct copy of a FIFA press release dated October 26, 2018, which is quoted in Paragraph 117 of the Amended Complaint.

6. Attached as Exhibit D is a true and correct copy of an ESPN article dated September 17, 2018, which is quoted in Paragraph 113 of the Amended Complaint.

7. Attached as Exhibit E is a true and correct copy of a webpage dated January 4, 2018, titled *MLS Releases 2018 Regular-Season Schedule*, as retrieved from MLS's website at <https://www.mlssoccer.com/schedule/2018/announcement>.

8. Attached as Exhibit F is a true and correct copy of a webpage dated January 7, 2019, titled *MLS Releases 2019 Regular-Season Schedule*, as retrieved from MLS's website at <https://www.mlssoccer.com/schedule/2018/announcement>.

9. Attached as Exhibit G is a true and correct copy of a webpage dated June 1, 2019, titled *Champions League 2018/19: All the Fixtures and Results*, as retrieved from UEFA's website at <https://www.uefa.com/uefachampionsleague/news/0252-0e9902dd97ae-bd3c7b568287-1000--champions-league-2018-19-all-the-fixtures-and-results/>.


10. Attached as Exhibit H is a true and correct copy of an ESPN article dated June 12, 2018, and titled *U.S. Tops 2018 World Cup Ticket Sales to Fans Outside of Russia*, as retrieved from ESPN's website at <https://www.espn.com/soccer/fifa-world-cup/story/3523402/us-tops-2018-world-cup-ticket-sales-to-fans-outside-of-russia>.

11. Attached as Exhibit I is a true and correct copy of a USA Today article dated June 25, 2014, and titled *U.S. Is No. 1 at World Cup (in Visiting Fans)*, as retrieved from USA Today's website at <https://www.usatoday.com/story/dispatches/2014/06/25/world-cup-traveling-fans-facebook-checkins/11389599/>.

12. Attached as Exhibit J is a true and correct copy of an Orlando Sentinel article dated June 18, 2015, and titled *TV Options Sign of Soccer's Growth*.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 7, 2020  
New York, New York



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H. Christopher Boehning